

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2022

## OUR BUSINESS

Search Consultancy Limited ("**Search**") operates in the recruitment sector providing permanent and temporary labour services in the UK and globally.

Search provides recruitment services to a range of industries including professional services, healthcare, technical and engineering, construction trades, IT, call and contact centres, office services and hospitality.

Search is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout supply chains, consistent with the relevant disclosure obligations under the Modern Slavery Act 2015.

## OUR POLICIES

Search has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.

Our Anti-Slavery and Human Trafficking policy ("**the policy**"), copy available upon request, applies to all persons working either for Search or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

There are also a number of other policies which assist in the shaping of our business dealings and conduct of our employees, including:

- Anti-Bribery and Corruption policy
- Diversity and Equal Opportunities policy
- Ethical policy
- Whistleblowing policy
- Code of Conduct for Employees

Our board of directors has overall responsibility for ensuring the policies comply with all legal and ethical obligations, and that all those under our control comply with it.

## DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Search has assessed its business and identified a particular risk within its Industrial & Logistics divisions. To address that risk, Search has registered as a Stronger Together Business Partner. Search provides mandatory training to its employees within the Industrial and Logistics divisions which specifically addresses how to identify and tackle hidden labour exploitation and encourages staff and workers to report any suspected cases.

Search is also a holder of a Gangmasters & Labour Abuse Authority (GLAA) Licence (SEAR 0001). To obtain a GLAA licence, Search is required to comply with 8 licensing standards to ensure protection of workers from poor treatment and exploitation including a Fit and Proper test and the Prevention of Forced Labour and Mistreatment of Workers standard.

Search expects the same high standards from all contractors, suppliers and other business partners, and as part of its contracting processes, each supplier contract includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it is expected that all suppliers will hold their own suppliers to the same high standards.

Search ensures that when assessing applicants for work, that the applicant's identity and right to work is properly evidenced and confirmed. All applicants who are engaged for temporary work are employees of Search and are able to work when they wish, take holidays when they want and leave Search's employment after required notice if they wish.

Search acknowledges that a potential indicator of modern slavery can be evidenced where multiple workers are using the same bank account details or residing at the same address. As an additional measure, Search will conduct quarterly checks of all given addresses and bank account details to ensure that there is no unexplained duplication of details.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All parties are required to avoid any activity that might lead to, or suggest, a breach of our policy and are actively encouraged to raise any concerns that they may have about any issue or suspicion of modern slavery in any parts of the business or supply chains.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

#### **TRAINING FOR STAFF**

Training and guidance on modern slavery and the risks our business may face from modern slavery in its supply chains will form part of the induction process for all individuals who work for Search and further support can be provided as necessary.

#### **SUMMARY**

Management at all levels are responsible for ensuring those reporting to them understand and comply with the policy, that they understand the issue of modern slavery in supply chains and how it may affect our business and that individuals are given further guidance as required.

This statement has been approved by the board of directors and is made in respect of the 2022 financial year.



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Stuart Dick, Chief Financial Officer  
Signed for and on behalf of Search Consultancy Limited

Date: 28/03/2022